

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:
MICHELLE ANN COLLER	: Chapter 13
Debtor	:
	: Case No. 1:18-bk-03505-HWV
DITECH FINANCIAL LLC	:
Movant	:
v.	:
	:
MICHELLE ANN COLLER	:
Respondent	:
	:
CHARLES J. DeHART, III, ESQ.	:
Trustee	:

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW the debtor, Michelle Ann Coller, by counsel, Philip C. Briganti, Esquire, and as her Answer to the Motion for Relief from the Automatic Stay filed in the above-captioned matter, hereby responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. Admitted. By way of further answer, Debtor avers that her inability to make the mortgage payments was caused by financial hardship arising from reduced employment income, loss of support income, and increased expenses. Debtor expects to obtain new employment which will enable her to make her future mortgage payments and cure the arrears.

7. Admitted. Debtor repeats and incorporates by reference her averments set forth above in paragraph 6.

8. Denied.

9. Denied.

10. Admitted.

WHEREFORE, Debtor requests that the relief requested by Movant be denied, and that the automatic stay not be modified.

Respectfully submitted,

Dated: October 25, 2019

s/ Philip C. Briganti
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